

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS**

JOE LUMPKINS, Individually and for Others
Similarly Situated,

Plaintiff,

v.

EN ENGINEERING, LLC, d/b/a
ENTRUST SOLUTIONS GROUP

Defendant.

Civil Action No. 1:23-CV-01824

**JOINT MOTION FOR
APPROVAL OF CLASS ACTION SETTLEMENT**

The Parties reached a proposed settlement that resolves all wage and hour claims asserted in this Action on a class and collective basis on behalf of the 57 Inspectors who worked for Defendant and were paid under Defendant's minimum guarantee plus extras pay plan at any point in the past 3 years and opted-in to the collective. The Agreement contemplates a settlement under 29 U.S.C. 216(b).

Because the proposed Agreement resolves all potential claims and satisfies the criteria for preliminary approval, Plaintiffs respectfully request the Court grant approval of the Agreement attached as Exhibit 1.

Plaintiffs conferred with Defendant in the formation and submission of this memorandum and Defendant does not oppose the motion.

Dated: June 3, 2025

JOSEPHSON DUNLAP

DUANE MORRIS LLP

By: /s/ Richard M. Schreiber
One of The Attorneys for Plaintiff and Opt-In Plaintiffs

By: /s/ Gerald L. Maatman
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Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of June, 2025, I filed the foregoing document on the Court's CM/ECF system.

/s/ Richard M. Schreiber

One of the Attorneys for Plaintiffs